

# UNITED STATES DISTRICT COURT

for the  
Central District of California

In the Matter of the Search of	)	Case No. 5:23-MJ-00061
(Briefly describe the property to be searched or	)	
identify the person by name and address)	)	
	)	
Sixteen United States Postal Service	)	
Priority Mail Express and Priority Mail	)	
parcels, currently in the custody of the	)	
United States Postal Inspection Service	)	

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

*See Attachment A*

located in the Central District of California, there is now concealed (*identify the person or describe the property to be seized*):

*See Attachment B*

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 841(a)(1), 843(b), and 846	See attached affidavit

The application is based on these facts:

*See attached Affidavit*

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (*give exact ending date if more than 30 days: \_\_\_\_\_*) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

\_\_\_\_\_  
*Applicant's signature*

United States Postal Inspector, Ross Hinckley  
\_\_\_\_\_  
*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Judge's signature*

City and state: Riverside, CA

Honorable Sheri Pym, U.S. Magistrate Judge  
\_\_\_\_\_  
*Printed name and title*

AUSA: Cory Burleson (951-276-6945)

**AFFIDAVIT**

I, Ross Hinckley, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of an application for a warrant to search sixteen United States Postal Service ("USPS") Priority Mail Express and Priority Mail parcels, currently in the custody of the United States Postal Inspection Service ("USPIS"), as described more fully in Attachment A ("SUBJECT PARCEL 1" through "SUBJECT PARCEL 16," and, collectively, the "SUBJECT PARCELS"). The requested search warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "SUBJECT OFFENSES"), as described more fully in Attachment B. Attachments A and B are incorporated by reference into my affidavit.

2. The facts set forth in this affidavit are based on my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation

into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are relayed in substance and in part only.

## **II. INTRODUCTION**

3. I am a United States Postal Inspector employed by the USPIS since June 14, 2003. I am assigned to the Madison, Wisconsin, Contraband Interdiction and Investigation Team, which is responsible for the investigation of narcotic and money laundering investigations. I have participated in numerous controlled substance investigations involving the transportation of controlled substances or proceeds from the sale of controlled substances through parcel delivery services, to include the USPS, as well as private delivery couriers such as United Parcel Service and Federal Express. Furthermore, in the course of assisting in past investigations, I have spoken with other Postal Inspectors and law enforcement agents who have substantial experience related to investigating schemes that utilize the United States Mail, and the evidence that can be obtained as a result.

4. As a Postal Inspector, my duties include investigating violations of postal law as it relates to mail theft, identity theft, and crimes against employees of the Postal Service. Additionally, my responsibilities include investigating of the unlawful use of the United States Mail for criminal activity, including the transportation of illegal drugs and proceeds from the sale of illegal drugs through the United States Mail. As part of my experience, I have received instruction in the

identification, collection and preservation of evidence, photography, latent print collection, and crime scene investigations. I have completed thousands of hours of criminal investigations - compiling information, interviewing victims, witnesses, and suspects, and collecting evidence to support the filing of criminal complaints. I have worked with other experienced Postal Inspectors, as well as other law enforcement officers and supervisors and have gained valuable knowledge and experience from them. I have prepared and assisted in the planning and service of numerous search warrants.

5. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. As a federal law enforcement officer, I am authorized to investigate violations of laws of the United States and authorized to execute search and arrest warrants under the authority of the United States.

6. My conclusions are based on the facts set forth in this affidavit, which I learned from my personal investigation and from other investigators in this case. Also, my statements and conclusions in this affidavit are based on my training and experience and on information relayed to me by other federal, state, and local law enforcement officers. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have set forth only the facts that I believe are necessary to establish that probable cause exists to believe

that evidence, fruits, and instrumentalities of violations of the SUBJECT OFFICES will be found in the SUBJECT PARCELS.

### **III. STATEMENT OF PROBABLE CAUSE**

#### **A. Background**

7. Based on my training and experience as a Postal Inspector, and the experiences relayed to me by fellow Postal Inspectors who specialize in drug investigations, I declare as follows:

a. Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In the early 1990s, Postal Inspectors in Los Angeles, California, and surrounding regions such as the High Desert/Low Desert areas that include Riverside and San Bernardino Counties, began conducting organized interdictions of Priority Mail Express and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances. Postal Inspectors also regularly examined and investigated Priority Mail Express and Priority Mail parcels. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances, in the form of cash, using boxes.

b. Although Postal Inspectors still see the use of boxes for controlled substances and cash, there has been a gradual change over the years toward the current trend of using smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted

to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances, which lend a sense of legitimacy to the parcel.

c. The San Bernardino County and Riverside County areas (collectively, the "Inland Empire") are a significant source area for controlled substances. Controlled substances are frequently transported from the Inland Empire area via the United States Mail, and the proceeds from the sale of controlled substances are frequently returned to the Inland Empire area via the United States Mail. These proceeds are generally in the form of money orders, bank checks, or similar monetary instruments in an amount over \$1,000. Based on my training and experience, I know that proceeds from the sale of controlled substances often contain the odor of controlled substances because they have been contaminated with or associated with the odor of one or more controlled substances.

d. Drug traffickers often use one of two USPS services: Priority Mail Express, which is the USPS overnight/next day delivery mail product, or Priority Mail Service, which is the USPS two-to-three-day delivery mail product. Drug traffickers use the Priority Mail Express delivery service because of its speed, reliability, and the ability to track the article's progress to the intended delivery point. Drug traffickers use the Priority Mail delivery service because it allows drug traffickers more time for travel between states if they decide to follow a shipment to its destination

for distribution. Also, by adding delivery confirmation to a Priority Mail parcel, drug traffickers have the ability to track the article's progress to the intended delivery point, as if the parcel had been mailed using the Priority Mail Express Service.

8. Based on my training and experience, and the collective experiences relayed to me by fellow Postal Inspectors who specialize in investigations involving the mailing of controlled substances and proceeds from the sale of controlled substances, I know that the following indicia suggest that a parcel may contain drugs or drug trafficking proceeds:

a. The parcel is contained in a box, flat cardboard mailer, or Tyvek envelope.

b. The parcel bears a handwritten label, whether USPS Priority Mail Express or Priority Mail.

c. The handwritten label on the parcel does not contain a business account number.

d. The seams of the parcel are all taped or glued shut.

e. The parcel emits a particular odor of a cleaning agent or adhesive or spray foam that can be detected by a human; and

f. Multiple parcels are mailed by the same individual, on the same day, from different locations.

9. Parcels exhibiting some of these characteristics are the subject of further investigation, which may include verification of the addressee and return addresses and examination by a trained drug detection dog.

10. I know from my experience and training that drug traffickers often use fictitious or incomplete names and/or addresses in an effort to conceal their identities from law enforcement officers investigating these types of cases and suspicious parcels. Indeed, it is my experience that to the extent real addresses are ever used it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

**B. Initial Investigation of the SUBJECT PARCELS**

11. On February 8, 2023, I identified the SUBJECT PARCELS at the San Bernardino Distribution and Processing Center, during routine parcel profiling. In doing so, I saw that the SUBJECT PARCELS met some of the above-mentioned indicia for the identification of parcels containing drugs or drug trafficking proceeds. Specifically, the SUBJECT PARCELS were mailed using USPS Priority Mail Express and Priority Mail, and they did not contain business account numbers.

12. On February 8, 2023, I used law enforcement and open-source databases to look up the return and recipient addresses listed on the SUBJECT PARCELS and determined the following:

a. SUBJECT PARCEL 1 is a USPS Priority Mail parcel bearing tracking label number 9505 5141 0130 3038 6510 19. The return address for SUBJECT PARCEL 1 is "Grandma, 22069 Cherokee Ave, Apple Valley, CA 92307." I was able to find the address using law enforcement and open-source databases, but I was unable to determine who "Grandma" is. I located the name "Terry



Lynn Smart" as associated to the address.<sup>1</sup> The recipient address listed for SUBJECT PARCEL 1 is "Jackson Pratt, 79368 Bayonet Circle, Colorado Springs, CO 80902." I found the address using law enforcement and open-source databases but was only able to associate the name "Caleb Pratt" to that address. I know through my training and experience that those sending and receiving narcotics through the mail will often use fictitious names or someone else's name to avoid law enforcement detection. SUBJECT PARCEL 1 was mailed on February 7, 2023, weighs 4 pounds and 5.2 ounces, and has \$22.80 in US Postage affixed.

b. SUBJECT PARCEL 2 is a USPS Priority Mail parcel bearing tracking label number 9505 5148 6778 3038 2365 50. The return address for SUBJECT PARCEL 2 is "Tim Evans, 26410 Santa Rosa Drive, Moreno Valley, CA 92555." I found the address using law enforcement and open-source databases but was unable to associate "Tim Evans" to that address. The recipient address for SUBJECT PARCEL 2 is "Tasha Moren, 1145 Pacifica Drive, Unit 200, Kissimmee, FL 34744." I found the address using law enforcement and open-source databases but was unable to associate "Tasha Moren" to that address. SUBJECT PARCEL 2 was mailed on February 7, 2023, weighs 5 pounds and 13.6 ounces, and has \$33.05 in US Postage affixed.

c. SUBJECT PARCEL 3 is a USPS Priority Mail parcel bearing tracking label number 9505 5150 6873 3038 3156 50. The

---

<sup>1</sup>According to a criminal history search, Smart was arrested in Maricopa County, Arizona, in October 2017, for possession of a dangerous drug, and the charges were dismissing in March 2019, after Smart completed a deferred prosecution program.

return address for SUBJECT PARCEL 3 is "Robyn Dass, 25563 Main St, Barstow, CA 92311." I found the address using law enforcement and open-source databases but was unable to associate "Robyn Dass" to it. The recipient address listed for SUBJECT PARCEL 3 is "V Ziegler, 275 S Main St, Sheffield, MA 01257." I found the address using law enforcement and open-source databases but was unable to associate the last name "Ziegler" to that address. SUBJECT PARCEL 3 was mailed on February 7, 2023, weighs 33 pounds and 4.2 ounces, and has \$179.60 in US Postage affixed.

d. SUBJECT PARCEL 4 is a USPS Priority Mail parcel bearing tracking label number 9505 5132 0944 3038 7123 80. The return address for SUBJECT PARCEL 4 is "Oscar Vazquez, 71777 Dinah Shore, Rancho Mirage, CA 92270." I found the address using law enforcement and open-source databases and was unable to associate "Oscar Vazquez" to that address. The recipient address for SUBJECT PARCEL 4 is "Jesus Carate, 138 Crawford St, Boston, MA 02121." I found the address using law enforcement and open-source databases and was unable to associate "Jesus Carate" to that address. SUBJECT PARCEL 4 was mailed on February 7, 2023, weighs 6 pounds and 14.3 ounces, and has \$22.80 in US Postage affixed.

e. SUBJECT PARCEL 5 is a USPS Priority Mail parcel bearing tracking label number 9505 5143 1116 3038 4637 09. The return address for SUBJECT PARCEL 5 is "Philipon Meh, 6979 S Nude Ave, San Bernardino, CA 92404." I was unable to find the address using law enforcement and open-source databases.

Additionally, I searched the return address using [www.usps.com](http://www.usps.com) and received the following message: "Unfortunately, this information wasn't found. Please double-check it and try again." The recipient address listed for SUBJECT PARCEL 5 is "Marcus Bradshaw, 432 N 21<sup>st</sup> St, Springfield, MI 49037." I found the address using law enforcement and open-source databases but was unable to associate "Marcus Bradshaw" to that address. SUBJECT PARCEL 5 was mailed on February 7, 2023, weighs 6 pounds and 3 ounces, and has \$22.80 in US Postage affixed.

f. SUBJECT PARCEL 6 is a USPS Priority Mail parcel bearing tracking label number 9505 5144 9688 3038 6037 37. The return address for SUBJECT PARCEL 6 is "Gary Johnson, 950 Knoll Drive, San Bernardino, CA 92408." I found the address using law enforcement and open-source databases but was unable to associate "Gary Johnson" to that address. The recipient address listed for SUBJECT PARCEL 6 is "Justin Henson, 2923 26<sup>th</sup> St W, Apt 210, Williston, ND 58801." I found the address using law enforcement and open-source databases but was unable to associate "Justin Henson" to that address. SUBJECT PARCEL 6 was mailed on February 7, 2023, weighs 7 pounds and 10 ounces, and has \$17.10 in US Postage affixed.

g. SUBJECT PARCEL 7 is a USPS Priority Mail parcel bearing tracking label number 9505 5125 9706 3038 6648 06. The return address for SUBJECT PARCEL 7 is "Seamore Buts, 5867 S Highland Ave, San Bernardino, CA 92404." I was unable to find the address using law enforcement and open-source databases. The recipient address listed for SUBJECT PARCEL 7 is "Marcus

Bradshaw, 432 N 21<sup>st</sup> St, Springfield MI 49037." This is the same recipient name and address as SUBJECT PARCEL 5. I was unable to associate "Marcus Bradshaw" to that address using law enforcement and open-source databases. SUBJECT PARCEL 7 was mailed on February 7, 2023, weighs 7 pounds and 10 ounces, and has \$22.80 in US Postage affixed.

h. SUBJECT PARCEL 8 is a USPS Priority Mail parcel bearing tracking label number 9505 5141 7513 3038 4560 49. The return address for SUBJECT PARCEL 8 is "Saul Flores, 14552 Hansdale St, Adelanto, CA 92301." I found the address using law enforcement and open-source databases but was unable to associate "Saul Flores" to that address. The recipient address listed for SUBJECT PARCEL 8 is "Luis Beaz, 215 Creekside Drive, Clarksville, TN 37042." I found the address using law enforcement and open-source databases but was unable to associate "Luis Beaz" to it. SUBJECT PARCEL 8 was mailed on February 7, 2023, weighs 11 pounds and 1.6 ounces, and has \$120.05 in US Postage affixed.

i. SUBJECT PARCEL 9 is a USPS Priority Mail Express parcel bearing tracking label number EJ 980 956 106 US. The return address for SUBJECT PARCEL 9 is "Oscar Gomez, 4310 Avon St, Jurupa Valley, CA 92509." I found the address using law enforcement and open-source databases but was unable to associate "Oscar Gomez" to that address. The recipient address listed for SUBJECT PARCEL 9 is "Joseph Young, 1735 Gaty Ave, East St. Louis, IL 62205." I found the address using law enforcement and open-source databases but was unable to

associate "Joseph Young" to it. Furthermore, using postal databases, I learned that, on February 7, 2023, this same address in East St. Louis, Illinois, received a parcel with a recipient name of "Gerald Young." On that parcel, "Oscar Gomez" was listed as the return name, with a Rancho Cucamonga, California return address. SUBJECT PARCEL 9 was mailed on February 7, 2023, weighs 3 pounds and 12 ounces, and has \$72.90 in US Postage affixed.

j. SUBJECT PARCEL 10 is a USPS Priority Mail Express parcel bearing tracking label number EI 606 491 295 US. The return address for SUBJECT PARCEL 10 is "Ruben Rivera, 4632 N Electric Ave, San Bernardino, CA 92407." The phone number 951-591-3090 is listed with the return address. I was able to find the address using law enforcement and open-source databases but was unable to associate "Ruben Rivera" to that address. I found that the return phone number is associated with a subject named "Yissel Suarez," and that name is also not associated with the return address. The recipient address listed for SUBJECT PARCEL 10 is "Jonathan Davis, 4524 Leonard Blvd S, Lehigh Acres, FL 33973." I found the address using law enforcement and open-source databases but was unable to associate the name "Jonathan Davis" to it. SUBJECT PARCEL 10 was mailed on February 8, 2023, weighs 21 pounds and 4 ounces, and has \$249.80 in US Postage affixed.

k. SUBJECT PARCEL 11 is a USPS Priority Mail Express parcel bearing tracking label number EI 641 513 289 US. The return address for SUBJECT PARCEL 11 is "Kimberly Knight, 329 W

3<sup>rd</sup> St, Perris, CA 92590." The phone number 951-854-0287 is listed with the return address. I found the return address using law enforcement and open-source databases but was unable to associate the name "Kimberly Knight" to it. I did not locate a name associated with the return phone number. The recipient address listed for SUBJECT PARCEL 11 is "Dwayne Long, 1301 Rosa L Parks Ave, Montgomery, AL 36108." The phone number 205-372-4412 was listed with the recipient address. I found the address using law enforcement and open-source databases, and the name "Duane Long" (a different spelling of the first name) is associated with the address. The recipient phone number came back to the name of "Diana Brown," but I was unable to associate that name with the recipient address. SUBJECT PARCEL 11 was mailed on February 7, 2023, weighs 2 pounds and 13 ounces, and has \$64.85 in US Postage affixed.

1. SUBJECT PARCEL 12 is a USPS Priority Mail Express parcel bearing tracking label number EJ 468 144 105 US. The return address for SUBJECT PARCEL 12 is "Texan Collision, 1001 S Texas 6, Sugarland, TX." I was able to find the address using law enforcement and open-source databases but was unable to associate the name "Texan Collision" to that address. The recipient address listed for SUBJECT PARCEL 12 is "Patrick James, 7918 S Parnell Ave, Chicago, IL 60620." I found the address using law enforcement and open-source databases and was unable to associate "Patrick James" to that address. SUBJECT PARCEL 12 was mailed on February 7, 2023, weighs 13 pounds and 8.8 ounces, and has \$151.35 in US Postage affixed.

m. SUBJECT PARCEL 13 is a USPS Priority Mail Express parcel bearing tracking label number EI 338 145 215 US. The return address for SUBJECT PARCEL 13 is "Jay Harris, 22944 Shore View Court, Wildomar, CA 92595." I was unable to find the address using law enforcement and open-source databases. Additionally, I searched the return address using www.usps.com and received the following message: "Unfortunately, this information wasn't found. Please double-check it and try again." The recipient address listed for SUBJECT PARCEL 13 is "Marcus Frazier, 5214 Burke Ave, Columbia, SC 29203." I found the address using law enforcement and open-source databases and "Marcus Frazier" is associated to it. SUBJECT PARCEL 13 was mailed on February 8, 2023, weighs 2 pounds, and has \$59.65 in US Postage affixed.

n. SUBJECT PARCEL 14 is a USPS Priority Mail Express parcel bearing tracking label number EJ 286 141 842 US. The return address for SUBJECT PARCEL 14 is "Kenny Newman, 26853 Mossway Street, Highland, CA 92749." The phone number 909-910-4903 is listed with the return address. I was able to find the address using law enforcement and open-source databases but was unable to associate "Kenny Newman" to it. Additionally, using the same databases, I reviewed the phone number listed, and it was not associated with the name "Kenny Newman." The recipient address listed for SUBJECT PARCEL 14 is "Sarah Thomas, 269 W Valley Drive, Fort Valley, GA 31030." The phone number 479-568-0183 is listed for the intended recipient. I found the address using law enforcement and open-source databases but was unable

to associate "Sarah Thomas" to it. Furthermore, I was unable to associate "Sarah Thomas" to the listed recipient phone number.

SUBJECT PARCEL 14 was mailed on February 8, 2023, weighs 7 pounds and 3 ounces, and has \$107.15 in US Postage affixed.

o. SUBJECT PARCEL 15 is a USPS Priority Mail Express parcel bearing tracking label number EI 207 343 425 US. The return address for SUBJECT PARCEL 15 is "Grandma Stickel, 36890 Del Web, Palm Desert, CA 92211." I was able to find the address using law enforcement and open-source databases but was unable to associate the last name "Stickel" to that address. The recipient address listed for SUBJECT PARCEL 15 is "Joanne Stickel, PO Box 2002, Nome, AK 99762." The phone number 907-304-2581 is listed with the recipient address. I found the address using law enforcement and open-source databases and determined "Joanne Stickel" is likely associated to it. The phone number is associated to "Vernon Stickel," who also is associated with the recipient address. SUBJECT PARCEL 15 was mailed on February 8, 2023, weighs 9 pounds and 12.8 ounces, and has \$122.90 in US Postage affixed.

p. SUBJECT PARCEL 16 is a USPS Priority Mail Express parcel bearing tracking label number 9470 1112 0622 3866 7357 60. The return address for SUBJECT PARCEL 16 is "Greg's Garage, 221 E Stuart Ave, Redlands, CA 92374." The phone number 234-523-4124 is listed with the return address. I was able to find the address using law enforcement and open-source databases and associated that business name to the address. However, the phone number listed for "Greg's Garage" in the open-source



database was not the return phone number listed on SUBJECT PARCEL 16. The recipient address listed for SUBJECT PARCEL 16 is "Allan Dorsey, 1853 Parnassus St, Memphis, TN 38108." I found the address using law enforcement and open-source databases but was unable to associate "Allan Dorsey" to that address. Postal Inspector David Wilson called the phone number listed in the open-source database for Greg's Garage and spoke with an individual named G.B. G.B. stated that he is the owner of Greg's Garage, and that he did not mail a parcel to Memphis, Tennessee, on February 7, 2023. SUBJECT PARCEL 16 was mailed on February 7, 2023, weighs 4 pounds and 11 ounces, and has \$77.43 in US Postage affixed.

**C. Drug-Detection Dog Alerts to the SUBJECT PARCELS**

13. On February 8, 2023, based on the suspicious characteristics of the SUBJECT PARCELS, San Bernardino County Sheriff's Detective Kristina Winegar had her trained narcotics detection dog, "Roxy," examine the exterior of the SUBJECT PARCELS. Attached to my affidavit as Exhibit 1, and incorporated by reference, is a true and correct copy of Officer Winegar's affidavit describing "Roxy's" training and history in detecting controlled substances.

14. To examine the SUBJECT PARCELS, USPIS personnel placed them in an area where Officer Winegar could perform a canine sniff with "Roxy." Officer Winegar informed me that "Roxy" gave a positive alert to each of the SUBJECT PARCELS separately, indicating that each of the SUBJECT PARCELS had the presence of controlled substances or other items, such as the proceeds of

controlled substances, which have been recently contaminated with the odor of controlled substances.

**IV. CONCLUSION**

15. For the reasons set forth above, there is probable cause to believe that the SUBJECT PARCELS, as described in Attachment A, contain evidence, fruits, and instrumentalities of violations of the SUBJECT OFFENSES, as described in Attachment B.

Attested to by the applicant in  
accordance with the requirements of  
Fed. R. Crim. P. 4.1 by telephone  
on this \_\_\_\_ day of February 2023.

---

THE HONORABLE SHERI PYM  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

PARCELS TO BE SEARCHED

1. The following sixteen United States Postal Service ("USPS") Priority Mail and Priority Mail Express parcels seized on February 8, 2023, at the San Bernardino Processing and Distribution Center located in San Bernardino, California, and currently in United States Postal Inspection Service custody:

a. SUBJECT PARCEL 1 is a USPS Priority Mail parcel bearing tracking label number 9505 5141 0130 3038 6510 19. The return address for SUBJECT PARCEL 1 is "Grandma, 22069 Cherokee Ave, Apple Valley, CA 92307." The recipient address listed for SUBJECT PARCEL 1 is "Jackson Pratt, 79368 Bayonet Circle, Colorado Springs, CO 80902." SUBJECT PARCEL 1 was mailed on February 7, 2023, weighs 4 pounds and 5.2 ounces, and has \$22.80 in US Postage affixed.

b. SUBJECT PARCEL 2 is a USPS Priority Mail parcel bearing tracking label number 9505 5148 6778 3038 2365 50. The return address for SUBJECT PARCEL 2 is "Tim Evans, 26410 Santa Rosa Drive, Moreno Valley, CA 92555." The recipient address for SUBJECT PARCEL 2 is "Tasha Moren, 1145 Pacifica Drive, Unit 200, Kissimmee, FL 34744." SUBJECT PARCEL 2 was mailed on February 7, 2023, weighs 5 pounds and 13.6 ounces, and has \$33.05 in US Postage affixed.

c. SUBJECT PARCEL 3 is a USPS Priority Mail parcel bearing tracking label number 9505 5150 6873 3038 3156 50. The return address for SUBJECT PARCEL 3 is "Robyn Dass, 25563 Main St, Barstow, CA 92311." The recipient address listed for

SUBJECT PARCEL 3 is "V Ziegler, 275 S Main St, Sheffield, MA 01257." SUBJECT PARCEL 3 was mailed on February 7, 2023, weighs 33 pounds and 4.2 ounces, and has \$179.60 in US Postage affixed.

d. SUBJECT PARCEL 4 is a USPS Priority Mail parcel bearing tracking label number 9505 5132 0944 3038 7123 80. The return address for SUBJECT PARCEL 4 is "Oscar Vazquez, 71777 Dinah Shore, Rancho Mirage, CA 92270." The recipient address for SUBJECT PARCEL 4 is "Jesus Carate, 138 Crawford St, Boston, MA 02121." SUBJECT PARCEL 4 was mailed on February 7, 2023, weighs 6 pounds and 14.3 ounces, and has \$22.80 in US Postage affixed.

e. SUBJECT PARCEL 5 is a USPS Priority Mail parcel bearing tracking label number 9505 5143 1116 3038 4637 09. The return address for SUBJECT PARCEL 5 is "Philipon Meh, 6979 S Nude Ave, San Bernardino, CA 92404." The recipient address listed for SUBJECT PARCEL 5 is "Marcus Bradshaw, 432 N 21<sup>st</sup> St, Springfield, MI 49037." SUBJECT PARCEL 5 was mailed on February 7, 2023, weighs 6 pounds and 3 ounces, and has \$22.80 in US Postage affixed.

f. SUBJECT PARCEL 6 is a USPS Priority Mail parcel bearing tracking label number 9505 5144 9688 3038 6037 37. The return address for SUBJECT PARCEL 6 is "Gary Johnson, 950 Knoll Drive, San Bernardino, CA 92408." The recipient address listed for SUBJECT PARCEL 6 is "Justin Henson, 2923 26<sup>th</sup> St W, Apt 210, Williston, ND 58801." SUBJECT PARCEL 6 was mailed on February 7, 2023, weighs 7 pounds and 10 ounces, and has \$17.10 in US Postage affixed.

g. SUBJECT PARCEL 7 is a USPS Priority Mail parcel bearing tracking label number 9505 5125 9706 3038 6648 06. The return address for SUBJECT PARCEL 7 is "Seamore Buts, 5867 S Highland Ave, San Bernardino, CA 92404." The recipient address listed for SUBJECT PARCEL 7 is "Marcus Bradshaw, 432 N 21<sup>st</sup> St, Springfield MI 49037." SUBJECT PARCEL 7 was mailed on February 7, 2023, weighs 7 pounds and 10 ounces, and has \$22.80 in US Postage affixed.

h. SUBJECT PARCEL 8 is a USPS Priority Mail parcel bearing tracking label number 9505 5141 7513 3038 4560 49. The return address for SUBJECT PARCEL 8 is "Saul Flores, 14552 Hansdale St, Adelanto, CA 92301." The recipient address listed for SUBJECT PARCEL 8 is "Luis Beaz, 215 Creekside Drive, Clarksville, TN 37042." SUBJECT PARCEL 8 was mailed on February 7, 2023, weighs 11 pounds and 1.6 ounces, and has \$120.05 in US Postage affixed.

i. SUBJECT PARCEL 9 is a USPS Priority Mail Express parcel bearing tracking label number EJ 980 956 106 US. The return address for SUBJECT PARCEL 9 is "Oscar Gomez, 4310 Avon St, Jurupa Valley, CA 92509." The recipient address listed for SUBJECT PARCEL 9 is "Joseph Young, 1735 Gaty Ave, East St. Louis, IL 62205." SUBJECT PARCEL 9 was mailed on February 7, 2023, weighs 3 pounds and 12 ounces, and has \$72.90 in US Postage affixed.

j. SUBJECT PARCEL 10 is a USPS Priority Mail Express parcel bearing tracking label number EI 606 491 295 US. The return address for SUBJECT PARCEL 10 is "Ruben Rivera, 4632 N

Electric Ave, San Bernardino, CA 92407." The phone number of 951-591-3090 is listed with the return address. The recipient address listed for SUBJECT PARCEL 10 is "Jonathan Davis, 4524 Leonard Blvd S, Lehigh Acres, FL 33973." SUBJECT PARCEL 10 was mailed on February 8, 2023, weighs 21 pounds and 4 ounces, and has \$249.80 in US Postage affixed.

k. SUBJECT PARCEL 11 is a USPS Priority Mail Express parcel bearing tracking label number EI 641 513 289 US. The return address for SUBJECT PARCEL 11 is "Kimberly Knight, 329 W 3<sup>rd</sup> St, Perris, CA 92590." The phone number 951-854-0287 is listed with the return address. The recipient address listed for SUBJECT PARCEL 11 is "Dwayne Long, 1301 Rosa L Parks Ave, Montgomery, AL 36108." The phone number 205-372-4412 was listed with the recipient address. SUBJECT PARCEL 11 was mailed on February 7, 2023, weighs 2 pounds and 13 ounces, and has \$64.85 in US Postage affixed.

l. SUBJECT PARCEL 12 is a USPS Priority Mail Express parcel bearing tracking label number EJ 468 144 105 US. The return address for SUBJECT PARCEL 12 is "Texan Collision, 1001 S Texas 6, Sugarland, TX." The recipient address listed for SUBJECT PARCEL 12 is "Patrick James, 7918 S Parnell Ave, Chicago, IL 60620." SUBJECT PARCEL 12 was mailed on February 7, 2023, weighs 13 pounds and 8.8 ounces, and has \$151.35 in US Postage affixed.

m. SUBJECT PARCEL 13 is a USPS Priority Mail Express parcel bearing tracking label number EI 338 145 215 US. The return address for SUBJECT PARCEL 13 is "Jay Harris, 22944 Shore

View Court, Wildomar, CA 92595." The recipient address listed for SUBJECT PARCEL 13 is "Marcus Frazier, 5214 Burke Ave, Columbia, SC 29203." SUBJECT PARCEL 13 was mailed on February 8, 2023, weighs 2 pounds, and has \$59.65 in US Postage affixed.

n. SUBJECT PARCEL 14 is a USPS Priority Mail Express parcel bearing tracking label number EJ 286 141 842 US. The return address for SUBJECT PARCEL 14 is "Kenny Newman, 26853 Mossway Street, Highland, CA 92749." The phone number 909-910-4903 is listed with the return address. The recipient address listed for SUBJECT PARCEL 14 is "Sarah Thomas, 269 W Valley Drive, Fort Valley, GA 31030." The phone number 479-568-0183 is listed for the intended recipient. SUBJECT PARCEL 14 was mailed on February 8, 2023, weighs 7 pounds and 3 ounces, and has \$107.15 in US Postage affixed.

o. SUBJECT PARCEL 15 is a USPS Priority Mail Express parcel bearing tracking label number EI 207 343 425 US. The return address for SUBJECT PARCEL 15 is "Grandma Stickel, 36890 Del Web, Palm Desert, CA 92211." The recipient address listed for SUBJECT PARCEL 15 is "Joanne Stickel, PO Box 2002, Nome, AK 99762." The phone number 907-304-2581 is listed with the address. SUBJECT PARCEL 15 was mailed on February 8, 2023, weighs 9 pounds and 12.8 ounces, and has \$122.90 in US Postage affixed.

p. SUBJECT PARCEL 16 is a USPS Priority Mail Express parcel bearing tracking label number 9470 1112 0622 3866 7357 60. The return address for SUBJECT PARCEL 16 is "Greg's Garage, 221 E Stuart Ave, Redlands, CA 92374." The phone number 234-

523-4124 is listed with the return address. The recipient address listed for SUBJECT PARCEL 16 is "Allan Dorsey, 1853 Parnassus St, Memphis, TN 38108." SUBJECT PARCEL 16 was mailed on February 7, 2023, weighs 4 pounds and 11 ounces, and has \$77.43 in US Postage affixed.



**ATTACHMENT B**

ITEMS TO BE SEIZED

The following are to be seized from the parcels described in Attachment A, which constitute evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance):

- a. Any controlled substances, including marijuana; cocaine, methamphetamines, opioids (i.e., fentanyl, etc.);
- b. Currency, money orders, bank checks, or similar monetary instruments in quantities over \$1,000; and
- c. Parcel wrappings used to conceal items described in (a) and/or (b).

# Exhibit 1

### **EXPERTISE OF DECLARANT**

I, Detective Kristina Winegar B5848, am a Detective with the San Bernardino County Sheriff's Department. I have been so employed since March 2002. I attended the San Bernardino County Sheriff's Basic Academy where I was given instruction in basic investigations, crimes against persons, crimes against property, and narcotic/controlled substance identification. I have conducted numerous investigations involving Forgery, Possession of stolen property, theft and fraud as well as violent crimes, assaults, homicides and sexual crime. I have been involved in well over 300 investigations/arrests involving burglaries, thefts, crimes against persons, identity theft, assault on person, and narcotics sales and possession.

NARCOTICS DIVISION: May 2014 to present.

In May 2014, I was temporarily assigned as the narcotics division High Desert Set team. I successfully completed 24-hour Short Hall Operations (STABO) training with Campaign Against Marijuana Planting (CAMP). Later that month, I was permanently assigned to narcotics. I was assigned as a Narcotics K9 handler in June 2014. While assigned to the Narcotics have participated in undercover buys where I have bought ecstasy at large public gathering events.

#### **NARCOTICS/CANINE EXPERTISE:**

I have attended a 120-hour course at Vohne Liche Kennels in narcotics detection. I attend this course with my K9 partner Roxy, a brown and white Springer Spaniel. K9 Roxy and I are a certified narcotics detection team through the California Narcotics Canine Association. We attend monthly maintenance training sponsored by Vohne Liche Kennels, weekly training with the Inland Empire Police Canine Association and Roxy and I train daily. Roxy has given a positive alert over 600 times in searches where illegal narcotics have been located and/or seized. I have written and served search warrants for narcotics transportation and sales, marijuana cultivation, stolen property, records/identity theft and other various criminal offenses. I have attended a 40 hour criminal interdiction conference in Austin Texas, a 40 hour criminal interdiction conference in New Orleans Louisiana, a 40 hour criminal interdiction conference in Chicago Illinois, a 40 hour criminal interdiction conference in Miami Florida, a 40 hour criminal interdiction conference in Nashville Tennessee, a 40 hour criminal interdiction conference in San Diego California, a 24 hours jetway interdiction course in Long Beach California, a 8 hour controlled delivery course, a 8 hours drug endangered children's course, a 16 hour reality based detection course with my K9 partner Roxy, a 80 hour Department of Justice methamphetamine clandestine lab safety course instructed by a state certified chemist. I participated in the live cook of methamphetamine, and an 80-hour training course with California Narcotics Canine Association.

Additionally, I have received training in drug use, symptomatology, and recognition of narcotics. I have continued my education in areas of narcotic

sales, trafficking, interdiction and possession, along with dangerous controlled substances including marijuana, methamphetamine, heroin, cocaine, psilocybin(mushrooms), MDMA (Ecstasy), PCP (phencyclidine), testosterone ester and anabolic steroids.

I have worked as a full time certified K9 handler since July 10, 2014. Since successfully completing K9 handler training, Roxy is responsible for the seizure of over 4,500 pounds of marijuana, 50 pounds of cocaine, over 300 pounds of methamphetamine, 600 pounds of liquid methamphetamine, 32 pounds of heroin, 250 pounds of concentrated cannabis, over 4,320 MDMA(Ecstasy) pills, 15 ounces of synthetic marijuana(spice), 10 kilos of Fentanyl and over \$2,000,000 in US currency.

Roxy and I last certified with California Narcotics Canine Association (CNCA) on January 10, 2023.

On Wednesday February 8, 2023, at about 1035 hours, while conducting a parcel inspection at the USPS facility located on Redland Blvd in San Bernardino, eight suspicious parcels were located. The parcels were set on the ground with other like parcels and separated by approximately 2 to 5 feet. I ran my narcotics detection K9 "Roxy" in the direction of the parcels at the facility. Upon reaching the parcels in question, K9 "Roxy" sat and stared indicating a positive "alert", that the packages and/or the contents was saturated with the odor of illegal narcotics.

Parcel 1

USPS parcel: 9505 5141 0130 3038 6510 19

Addressed to Jackson Pratt

79368 Bayonet Circle, Colorado Springs, CO 80902

Parcel 2

USPS parcel: 9505 5148 6778 3038 2365 50

Addressed to Tasha Moren

1145 Pacifica Drive, Unit 200, Kissimmee, FL 34744

Parcel 3

USPS parcel: 9505 5150 6873 3038 3156 50

Addressed to V. Ziegler

275 S. Main St., Sheffield, MA 01257

Parcel 4

USPS parcel: 9505 5132 0944 3038 7123 80

Addressed to Jesus Carate

138 Crawford St., Boston, MA 02121

Parcel 5

USPS parcel: 9505 5143 1116 3038 4637 09

Addressed to Marcus Bradshaw

432 N. 21<sup>st</sup> St., Springfield, MI 49037

Parcel 6

USPS parcel: 9505 5144 9688 3038 6037 37

Addressed to Justin Henson

2923 26<sup>th</sup> St. W., Apt 210, Williston, ND 58801

Parcel 7

USPS parcel: 9505 5125 9706 3038 6648 06

Addressed to Marcus Bradshaw

432 N. 21<sup>st</sup> St., Springfield, MI 49037

Parcel 8

USPS parcel: 9505 5141 7513 3038 4560 49

Addressed to Luis Beaz

215 Creekside Drive, Clarksville, TN 37042

Later that same day, Wednesday, February 8, 2023, at about 1705 hours, while conducting a parcel inspection at the USPS facility located on Redlands

Blvd. in San Bernardino, eight suspicious parcels were located. The parcels were set on the ground with other like parcels and separated by approximately 2 to 5 feet. I ran my narcotics detection K9 "Roxy" in the direction of the parcels at the facility. Upon reaching the parcels in question, K9 "Roxy" sat and stared indicating a positive "alert", that the packages and/or the contents was saturated with the odor of illegal narcotics.

Parcel 9

USPS parcel: EJ 980 956 106 US

Addressed to Joseph Young

1735 Gaty Ave., East St. Louis, IL 62205

Parcel 10

USPS parcel: EI 606 491 295 US

Addressed to Jonathan Davis

4524 Leonard Blvd. S, Leigh Acres, FL 33973

Parcel 11

USPS parcel: EI 641 513 289 US

Addressed to Dwayne Lang

1301 Rosa L. Parks Ave., Montgomery, AL 36108

Parcel 12

USPS parcel: EJ 468 144 105 US

Addressed to Patrick James

7918 S. Parnell Ave., Chicago, IL 60620

Parcel 13

USPS parcel: EI 338 145 215 US

Addressed to Marcus Frazier

5214 Burke Ave., Columbia, SC 29203

Parcel 14

USPS parcel: EJ 286 141 842 US

Addressed to Sarah Thomas

269 W. Valley Drive Fort Valley, GA 31030

Parcel 15

USPS parcel: EI 207 343 425 US

Addressed to Joanne Stickel

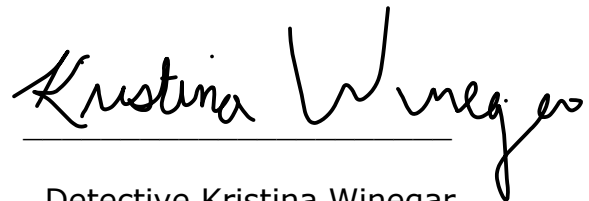
PO Box 2002, Nome, AK 99762

Parcel 16

USPS parcel: 9470 1112 0622 3866 7357 60

Addressed to Allan Dorsey

1853 Parnassus St, Memphis, TN 38108

A handwritten signature in black ink, reading "Kristina Winegar". The signature is written in a cursive style. Below the signature is a horizontal line.

Detective Kristina Winegar

San Bernardino County Sheriff